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28 April 1995

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MEMORANDUM

From: David Porter, SOUTHDIV

To: Lawson Anderson, EnSafe
Tonya Barker/Rob Williamson, NAS Memphis
Chris Bartku, SOUTHDIV
Jack Carmichael, USGS
Jordan English/Jim Morrison, TDEC (Memphis)
Sue Hosmer, NAS Memphis
Keith Johns, EnSafe
Sue Lawley, SOUTHDIV
CDR R. P. Mason/LCDR D. Archambault, NAS Memphis
Mark Taylor, SOUTHDIV
Clinton Willer, TDEC (Nashville)
David Williams, EPA Region IV

Subj: NAS MEMPHIS BRAC CLEANUP TEAM (BCT) MEETING, 24-26 APR 95

Encl: (1) BCT Meeting Minutes

1. Enclosure (1) is forwarded for your review and information. In addition to on-going review and recurring requirements, the list below summarizes follow-up assignments from the BCT and RAB meetings:

Lawson Anderson/Keith Johns/Becka Presley/Mark Bowers:

- Revise METALS poster, and create new poster with RBC explanation.
- Correct demographic data sheet errors.
- Develop database training for next BCT meeting.
- Revise Interim Measures Work Plan for SWMU 19 by 28 April.
- With risk assessor's input, draft information package to be given to RAB members on test results from Assembly A and background sampling.
- With risk assessor's input, develop method and schedule for determining background levels and present to the BCT at the next meeting.
- Distribute new base maps and disks.
- Sample CBU Complex eye wash drainage drum while field GC is on site in May
- Work with NAS Memphis personnel on investigating possible sources/explanation of TCA along airfield runways (document any findings in the Gray Area Report).
- Coordinate with NAS Memphis personnel on the sampling of the waste oil tank at SWMU 19 (Navy Exchange) and setup an account with the laboratory for the analysis.

Tonya Barker/Rob Williamson/Danny Chumney/Randy Wilson/Jim Heide:

- Obtain a permit from the BFI Landfill for the disposal of soil from SWMU 45.
- Coordinate the disposal of IDW from the background sites using Federal Prisoner labor.

- Develop a written scenario for use of potable water well No. 1 (notify water plant operator that well No. 1 can be used if needed to meet water demands).
- Coordinate the closure of SWMU 19 waste oil tank at Navy Exchange, and conduct sampling of the tank and transport sample to the laboratory.

Chris Bartku:

- Coordinate review of the revised Interim Measures Work Plan for SWMUs 66 and 67.

Jack Carmichael:

- Finalize poster with simplified geology cross section (color and dry mount) for the next RAB meeting.

Jordan English:

- Continue efforts to develop a memorandum, with concurrence from various TDEC departments, on non-regulated tanks.

David Porter:

- Revise RAB letterhead to include Russell Neighbors.
- Provide Rodney Lumpkins with additional background information on Millington Aviation Services.
- Continue with the development of a FOSL for the area requested by Millington Municipal Airport Authority (have draft prepared for next BCT meeting).
- Investigate the possibility of using CAPT Willis' discretionary entertainment fund (if one exists) to provide food and drink at RAB meetings.

Clint Willer:

- Research, determine, and document the extent of the Navy's environmental liability in Tennessee when property is leased (do lease requirements lessen the Navy's liability?, can memorandum of understanding be developed to lessen the Navy's liability?, can lessee obtain Hazardous Waste ID number?, can enforcement actions/NOVs be directed to the generator/lessee rather than the Navy?, etc.).

2. Reminder: the May BCT meeting has been rescheduled for 7-8 June, beginning at 11:30 am on Wednesday June 7th. The Millington Base Reuse Committee will meet on the morning of Thursday June 8th, followed by a public hearing Thursday evening. The June BCT/RAB meeting will be 26-28 June.

3. Please call if you have comments and/or questions: (803) 743-0610, DSN 563, e-mail: dlporter@efdsouth.navfac.navy.mil.



NAS MEMPHIS BCT MEETING MINUTES
24-26 APRIL 1995

A meeting of the NAS Memphis BRAC Cleanup Team was convened at 11:30 am on Monday 24 April in the CO's conference room in building S-1. The following people were in attendance:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NAS Memphis
CDR Elkins, NAS Memphis
Jordan English, TDEC (Memphis)
Sue Hosmer, NAS Memphis
David Porter, SOUTHDIV
Becka Presley, EnSafe (Memphis)
Mark Taylor, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV
Rob Williamson, NAS Memphis
CAPT Willis, NAS Memphis

Sue Hosmer noted that Russell Neighbors' name had been omitted from the RAB letterhead.

The BCT conducted a "dry run" of the RAB meeting to be held Tuesday night. It was decided that since not all data from Assembly A work has been validated, that the RAB would be briefed in general on preliminary findings. It was decided to limit the discussion to the two compounds that were found in soil that exceed residential Risk Based Concentration (RBC) screening levels: benzo(a)pyrene and dieldrin. Clint Willer reviewed the charter and the discussion he plans to lead on possible revisions to the charter at the RAB meeting. CDR Elkins noted that some mentioned needed to be made to the RAB about SWMU 19 (removal of waste oil tank at Navy Exchange). A discussion followed about the RAB's purpose and mission (BRAC versus non-BRAC issues). Jordan English and Clint Willer noted that the basic frame-work of the RAB is in place to also handle non-BRAC issues, but that at some point some of the members of the RAB may change since its original mission and focus was to look at BRAC-related issued. It was noted that some mention needs to be made of the pending disposal of drums of soil and water from the background sites. David Williams briefed the BCT on the presentation he will be making on the FOSL process. He will be using the fact sheet developed by EnSafe. The meeting was adjourned for lunch at 12:45 pm.

The meeting was reconvened at 1:30 pm in a classroom adjacent to the Environmental offices in building S-241. The following people were in attendance:

Rodger Aitken, NAS Memphis
Lawson Anderson, EnSafe (Memphis)
LT Dave Archambault, NAS Memphis
LT T. J. Armstrong, NAS Memphis
Lee Barker, NAS Memphis

Tonya Barker, NAS Memphis
Bryant Bondurant, Barge, Waggoner, Sumner & Cannon
Jack Carmichael, USGS (Nashville)
Jordan English, TDEC (Memphis)
Jim Ferguson, Millington Base Reuse Committee
Jim Hicks, RKG Associates, Inc.
Michael Hein, Water and Air Research
LT E. M. Hurt, NAS Memphis
CDR Rich Mason, NAS Memphis
Darrell Molzan, SOUTHDIV
Raymond Nelson, SOUTHDIV
CDR Rich Payne, NAS Memphis
David Porter, SOUTHDIV
Craig Seymour, RKG Associates, Inc.
Barry Steinberg, consultant to RKG Associates, Inc.
Mark Taylor, SOUTHDIV
Phil Whittenberg, Millington Base Reuse Committee
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV
Rob Williamson, NAS Memphis
Randy Wilson, NAS Memphis

The purpose of this meeting was to establish communication between the city's reuse planning efforts and the Navy's efforts with the environmental cleanup of the base and the Environmental Impact Statement process.

Darrell Molzan (SOUTHDIV) and Michael Hein (Water and Air Research - SOUTHDIV's EIS contractor) briefed the group on the status of the Environmental Assessment (EA) and Environmental Impact Statement (EIS). The Findings of No Significant Impact (FONSI) for the EA for the south side realignment was signed last Thursday. The EIS process is currently on hold, pending the completion of the community's reuse plan. Jim Hicks (RKG Associates, Inc. - the community's base reuse plan contractor) and Barry Steinberg (consultant to RKG Associates, Inc.) expressed several concerns with the existing EA, including what they considered fragmentation, lack of data on certain issues (primarily traffic), and lack of participation of the city's reuse task force in the process. David Porter discussed the status of the cleanup efforts and the BCT's priorities for cleanup. He stated that a Finding of Suitability to Lease (FOSL) is being prepared in response to the Millington Airport Authority's request for lease of the airfield and Hangar 798 as of October 1995. He stated that there is no environmental reason why this lease cannot be obtained. Jim Hicks expressed concern over the deadline. CDR Mason noted that the Navy had met the deadline for the lease of Hangar N-126, and anticipated doing so for this request. David Williams noted that much of the area is in a condition to be transferred, pending completion of the EIS.

David Porter discussed the planned removal of tanks and oil/water separators from BRAC areas. Barry Steinberg asked if this was a written Navy or DOD policy, or whether this was a local

decision. David Porter noted that some of the tanks were being removed because they did not meet pending regulatory requirements, and the others were being removed to limit future liability considerations. Both the Navy and the city acknowledged the need for further discussions about this issue. Raymond Nelson noted that the removal of tanks is a standard practice at closing bases to limit liability.

Raymond Nelson briefed the group on real estate issues, including the leasing/transfer of property. He noted that the Navy does not intend to entertain a long term (60 year) lease, rather a 5 year lease with options to transfer the property once environmental concerns have been addressed. He stated that the Navy is willing to work with the community on the specifics of lease/transfer, and suggested the community consider negotiated sale transfers.

The meeting was adjourned at 3:30 pm.

The BCT reconvened in the Environmental conference room in building S-241 at 3:45 pm. The following people were in attendance:

Roger Aitken, NAS Memphis
Lawson Anderson, EnSafe (Memphis)
Jack Carmichael, USGS (Nashville)
Jordan English, TDEC (Memphis)
David Porter, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV
Rob Williamson, NAS Memphis

Roger Aitken discussed information he had gathered regarding the rubble pile in the field south of SWMU 60. According to a discussion he had with his predecessor, the rubble pile is from an airfield parking apron overlay project in the 1950s. Pavement adjacent to the hangars was removed in order to maintain existing hangar floor elevations. The BCT decided no further action was required on this item. Roger Aitken will perform a visual inspection of the structures David Williams noted along Bethuel Road. Roger Aitken had no additional information about the tank at the incinerator (SWMU 36), or the concrete pads adjacent to the railroad spur at SWMU 60. The location of the tank will try to be determined when sampling is conducted at the site of the incinerator.

Jordan English reported on follow-up items from the previous BCT:

- **Determine proper procedures for reporting potable water issues to TDEC/Memphis and Shelby County Health Department:** A letter should be submitted to the Water Supply department of TDEC (POC is Tom Moss in Nashville), with a copy to the Memphis and Shelby County Health Department (MSCHD). MSCHD is the permitting agency for the drilling of wells.
- **Submit comments on Gray Area Report by next BCT meeting:** Jim Morrison will provide comments on Tuesday, 25 April.

- Obtain concurrence from various TDEC programs (solid waste/clean water/UST) on the removal of non-regulated tanks, and develop a matrix with requirements: Jordan English is developing a memorandum on tanks, and is working with TDEC RCRA and Solid Waste approval. Non-regulated tanks fall back on MCLs under the Clean Water regulations. The memorandum will discuss the use of UST soil standards for non-regulated tanks. Jordan English noted that a variance can be requested from TDEC if the groundwater exceeds the limits. All groundwater is considered drinking water in Tennessee. Re well head protection, only general guidance is available from EPA. Tom Moss has this information.

The meeting was adjourned for the day at 5:00 pm. Prior to reconvening the following morning, the BCT attended the Millington Base Reuse Committee meeting at Millington City Hall at 9:00 am. The BCT meeting was reconvened at 10:30 am in the Environmental conference room in building S-241. The following people were in attendance:

Lawson Anderson, EnSafe (Memphis)
 Mark Bowers, EnSafe (Raleigh)
 Jack Carmichael, USGS (Nashville)
 Jim Morrison, TDEC (Memphis)
 Bill Parks, USGS (Memphis)
 David Porter, SOUTHDIV
 Mark Taylor, SOUTHDIV
 Clint Willer, TDEC (Nashville)
 David Williams, EPA Region IV
 Rob Williamson, NAS Memphis

Lawson Anderson reported on the follow-up items from the previous BCT:

- Finalize poster session and handouts on typical contaminants for 25 April RAB meeting: Posters have been finalized.
- Develop fact sheet/handout on FOSL process for 25 April RAB meeting: Fact sheet has been developed.
- Put together existing demographic data of Millington and surrounding area for 25 April RAB meeting: Demographic data has been compiled.
- Finalize work plan for SWMU 45: Has been completed
- Determine memory requirements for EBS database and set up training session for BCT on use of the database: Database has no special memory requirements. Steve Green and Lawson Anderson will work individually with anyone having memory problems running the program. Lawson Anderson will setup database training for the next BCT meeting.
- Develop Interim Measures Work Plan for removal of waste oil tank at SWMU 19 not later than 10 April: Work plan has been developed and submitted to regulators for review.
- With risk assessor's input, draft information package to be given to RAB members on test results to date, including dieldrin results from background locations: Soil data has not been validated, and not all groundwater data has been received. Since not all the data is available, the BCT decided to table a detailed discussion of the results until the next RAB meeting. The dieldrin and benzo(a)pyrene levels in soil exceeding the residential RBCs will be

mentioned at tomorrow night's RAB, but will not be discussed in depth. EnSafe will continue to work on this issues for the next RAB.

- **With risk assessor's input, develop method and schedule for determine background levels and present to the BCT at the next meeting:** Tabled until the next BCT meeting - Mark Bowers is continuing to work on this item. He plans to conduct parallel assessments, with and without dieldrin data, and relate the two.
- **Distribute new base maps and disks:** Per Lawson Anderson, the contractor is having problems relating the state plane coordinates with the base grid system. This has delayed delivery of the maps. Lawson Anderson has asked for all deliverables except the one relating to the base grid system.
- **Sample CBU Complex eye wash drainage drum while field GC on-site in May:** Pending field work in May

The meeting was adjourned for lunch at 12:15 pm, and reconvened at the same location at 1:30 pm. The following people were in attendance:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NAS Memphis
Jack Carmichael, USGS (Nashville)
Danny Chumney, NAS Memphis
Jim Heide, NAS Memphis
Rodney Lumpkins, TDEC (Memphis)
Jim Morrison, TDEC (Memphis)
Bill Parks, USGS (Memphis)
David Porter, SOUTHDIV
Mark Taylor, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV
Rob Williamson, NAS Memphis
Randy Wilson, NAS Memphis

Rodney Lumpkins discussed liabilities under RCRA. Of concern to NAS Memphis is the possible waste generating activities of the Fixed Based Operator (Millington Aviation Services), a sub-lessee under the Navy lease with the Millington Municipal Airport Authority. If FBO is inspected and fails to meet regulatory requirements, will NOV be issued to Navy or FBO?, etc. According to Rodney Lumpkins, the property owner (the Navy) is the only party who can hold an EPA Hazardous Waste Generator ID number, and all waste must be shipped under that property owner's ID number. Rodney Lumpkins did state that NOV's and other actions may be directed to the operator (FBO), but the Navy still has the ultimate liability as the property owner, regardless of any lease conditions the Navy and the airport authority have agreed upon. Both Rodney Lumpkins and Clint Willer will investigate this issue further, and will provide the Navy with a written response. Both Rodney Lumpkins and Clint Willer were given a copy of the Navy's lease with the airport authority. Rodney Lumpkins asked for any background information the Navy had on Millington Aviation Services.

Rob Williamson reported on follow-up issues from the previous BCT for NAS Memphis:

- Obtain special permit for disposal of soil from SWMU 45: Rodney Lumpkins delivered the permit to the meeting. Danny Chumney noted that a permit is also needed from the BFI Landfill, and would take at least two weeks to obtain.
- Secure vendor passes for Jordan English, David Williams, and Clint Willer: Vendor passes are available at the Willis Gate on Navy Road.
- Coordinate the disposal of IDW from the backgrounds wells at SWMU 60 using Federal Prisoner labor: Ongoing.
- Develop a written scenario for use of potable water well No. 1 in case of emergency: Rob Williamson reported that the base has not completed action on this item. Both Clint Willer and David Williams noted that there was no reason not to use well No. 1 if it is needed. It was a BCT, not a state decision, to shut it down. Jack Carmichael and Bill Parks would like to sample both Memphis Sands wells while the GC is on site during the next round of field work. Jack Carmichael questioned whether to pump well No. 1 to the system or to waste. It was decided that the well would be brought back on line for the sampling using normal operating procedures. Well No. 1 will be used if needed to meet water requirements. NAS Memphis will develop a written scenario.

Jack Carmichael reported on follow-up issues from the last BCT meeting:

- Produce simplified geology cross-section poster for use as reference at 25 April and future RAB meetings. Jack Carmichael provided copies of the stratigraphic report for the BCT and RAB. He presented a draft simplified cross section for the BCT review. The BCT approved the concept and suggest the addition of coloring for visual impact and readability. Jack Carmichael will finalize and color the graph, and will dry mount for the next RAB meeting.
- Revise statement of work for stratigraphic borings, per TDEC and EPA comments: Statement of work was revised, and field work has been completed.

The BCT discussed the Interim Measures Work Plan for SWMU 19 (removal of waste oil tank at Navy Exchange). Mark Taylor and Lawson Anderson noted that the plan will be revised to include removal of the tank with a back fill of clean soil, rather than excavation. David Williams noted that a full scan (with metals, less pesticides) is needed on the contents of the tank. Due to money constraints on the removal contract, the activity will collect this sample and transport to the laboratory (EnSafe will setup an account with the laboratory to pay for this work). The activity will coordinate taking this tank out of service. The sample will include both oil and sludge phases. David Williams also requested that the comprehensive safety plan from the RFI be added to the work plan. Lawson Anderson will incorporate changes and will issue revised pages by fax on Friday, 28 April (hard copies will follow). Both David Williams and Jim Morrison agreed to provide approvals by the afternoon on April 28th.

The BCT discussed the Gray Area Report. Jim Morrison stated that more work was needed to ensure the groundwater around the runways was not contaminated, since small amounts of TCA showed up in shallow soil samples. The BCT decided not to pursue further testing, but Lawson Anderson and the activity will investigation possible sources of the TCA, such as skid mark

remover, etc. Lawson Anderson will address comments on the Gray Area Report and issue a final document.

David Porter addressed follow-up items from the last BCT for himself and Chris Bartku:

- Coordinate with RAC contractor to incorporate comments to-date on SWMU 66/67 work plan, and submittal of re-write to regulators for review: Revised work plan was due from Morrison Knudsen on 19 April.
- Distribute RAB meeting minutes for 27 February meeting and announce 25 April meeting: Completed.
- Develop FOSL for Millington Municipal Airport Authority: In progress. Draft FOSL will be available for EPA/TDEC review in June/July.
- Coordinate to have EIS contractor represented at next BCT meeting: Accomplished.

Mark Taylor addressed follow-up items from the last BCT:

- Follow-up with Roger Aitken regarding rubble pile south of SWMU 60: Addressed by Roger Aitken on Monday afternoon.
- Put together information and correspondence on previous tank removal at SWMU 15 (why it was done, under what authority, etc.): Information has been collected and provided to Lawson Anderson..

David Williams addressed follow-up items form the last BCT:

- Research EPA well head protection guidance/info and bring to next BCT meeting: David Williams found that the EPA has little guidance on well head protection, and that the program lies with the states for implementation.
- Submit comments on Gray Area Report by next BCT meeting: Discussed verbally earlier in the afternoon.

The meeting was adjourned for the day at 5:00 pm.

NOTE: A meeting of the Restoration Advisory Board was held at 6:30 pm. Minutes will be forwarded separately.

The BCT meeting was reconvened on Wednesday morning at 8:00 am in the Environmental conference room in building S-241. The following people were in attendance:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NAS Memphis
Jim Morrison, TDEC (Memphis)
David Porter, SOUTHDIV
Becka Presley, EnSafe (Memphis)
Mark Taylor, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV (and visiting Community Relations Specialist)

Rob Williamson, NAS Memphis

The BCT discussed the RAB meeting of the previous evening. Tonya Barker noted that John Smith had requested plans and specifications for the FBO tanks. She feels this is an airport authority responsibility, but will coordinate with the airport authority to ensure Mr. Smith gets a copy. For the next RAB, Lawson Anderson will develop a draft presentation on the data from Assembly A and background locations, and will provide to the BCT for review at the 7-8 June meeting. Given the low turn-out at last night's meeting, several people suggested providing food and drink at future meetings. Clint Willer noted that CAPT Willis probably has a discretionary entertainment fund which could be tapped.

The meeting was adjourned at 8:50 am.
